

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Amendment of Part 90 of the)
Commission's Rules To Provide)
for the Use of the 220-222 MHz)
Band by the Private Land Mobile)
Radio Service)

PR Docket No. 89-552

Implementation of Sections 3(n))
and 332 of the Communications Act)

GN Docket No. 93-252

Regulatory Treatment of Mobile)
Services)

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Implementation of Section 309(j))
of the Communications Act --)
Competitive Bidding, 220-222 MHz)

PP Docket No. 93-253

REPLY COMMENTS OF SECURICOR RADIOCOMS LTD.

Securicor Radiocom Ltd. ("Securicor"), by its counsel
and pursuant to Section 1.415 of the Commission's Rules, 47
C.F.R. §1.415, hereby submits its Reply Comments on the Third
Notice of Proposed Rulemaking, FCC 95-312 (August 28, 1995)
("Third Notice") in the above-captioned proceeding.¹

In its Comments on the Third Notice, Securicor stated
its view that the "Phase I" 220-222 MHz band ("220 Band") rules
were accomplishing the FCC's goal of promoting the development
and deployment of spectrally-efficient narrowband technologies in
the U.S. despite the complicated and litigious history of the 220
Band allocation to the Private Land Mobile Radio Service.

¹In the Matter of part 90 of the Commission's Rules to
Provide for the Use of the 220-222 MHz Band by the Private Land
Mobile Radio Service (Second Memorandum Opinion and Order and
Third Notice of Proposed Rulemaking), __ FCC Rcd __ (1995).

Securicor thus supported the adoption of Rules by the Commission in this proceeding that support the timely and orderly licensing of Phase II 220 Band systems in a manner that promotes the expansion of Phase I system. Securicor therefore cautioned against the adoption of Rules that reflected a radical departure from the Phase I Rules that have been relied upon by both manufacturers and service providers in investing in the 220 Band. Securicor particularly urged that for Phase II licensing the FCC not redraw the channel plan for the 100 trunked non-nationwide channels licensed in Phase I, noting the severe complications in coordination and consolidation between licensees that would result.

In response to the Third Notice, the FCC received approximately twenty Comments from existing equipment manufacturers,² 220 Band system consolidators,³ nationwide commercial 220 Band licensees,⁴ pending applicants for the nationwide non-commercial authorizations,⁵ and industry

²See, e.g., Comments of SEA, Inc. ("SEA"); Comments of E.F. Johnson Co. ("E.F. Johnson").

³See, e.g., Comments of Incom Communications Corporation ("Incom"); Comments of Roamer One, Inc. ("Roamer One"); Comments of SMR Advisory Group, L.C. ("SMR Advisory").

⁴See, e.g., Comments of Overall Wireless Communications Corporation ("Overall Wireless"); Comments of ComTECH Communications, Inc. ("ComTECH").

⁵See, e.g., Comments of U.S. Central, Inc. ("U.S. Central"); Comments of The Ericsson Corporation ("Ericsson"); Comments of 360 Mobile Data Joint Venture ("360 Mobile Data").

associations.⁶ In addition, the Commission received only one comment from any manufacturer, or prospective manufacturer, of equipment that may benefit from a radical departure from the Phase I service rules,⁷ and several comments from paging companies divided on the issue of permitting paging operations on a primary basis in the 220 Band.⁸

In Securicor's view, the representation of the substantial and existing 220 Band interests by the Comments confirms that the Phase I service rules are achieving their intended purposes and that the 220 Band PLMR allocation will realize many benefits for the public if the Commission "stays the course" with Phase II service rules that support the timely and smooth expansion of Phase I systems. Many parties, including Securicor, clearly have made substantial commitments to bringing the benefits of very narrowband systems to the public in the 220 Band in reliance upon the Phase I rules.

By contrast, a change in the fundamental character and purpose of the 220 Band is not supported by the Comments that have been submitted in this Docket. But a single party, Metricom, has expressed any interest in deploying equipment in

⁶See, e.g., Comments of the American Mobile Telecommunications Association ("AMTA"); Comments of UTC, The Telecommunications Association ("UTC").

⁷Comments of Metricom, Inc. ("Metricom").

⁸See, e.g., Comments of ProNet Inc. ("Pronet"); Comments of PageMart Operations, Inc. ("PageMart"); Comments of Paging Network, Inc. ("PageNet").

the 220 Band that may benefit from the redrawing of the Phase I channel plans to create contiguous channel assignments. The paging community itself appears divided on the issue of permitting primary paging operations in the 220 Band. ProNet, for example, states that "the Third NPRM's paging proposition is inherently unfair and should be rejected by the Commission."⁹

The record here thus confirms that the most realistic and orderly approach to Phase II licensing in the 220 Band is to adopt rules that facilitate the expansion of Phase I systems. To this end, AMTA, acting upon the advice of its 220 MHz Council (which includes representatives of the vast majority of incumbent licensees, 220 MHz network organizers and equipment suppliers) states that "[i]f the Commission now assigns its [Phase II licenses] on contiguous frequencies, rather than maintaining the current separation pattern, it will create significant difficulties for both existing and potential 220 MHz licensees."¹⁰ This view is shared by SEA and E.F. Johnson in addition to Securicor. Indeed, as noted in Securicor's Comments (at 12-16), the redrawing of the 220 Band channel assignments for Phase II licensing will result in a chaotic and unworkable band environment that will exponentially increase the difficulties of coordinating co-channel operations and of consolidating regional systems. This, in turn, will both increase the costs of 220 Band

⁹ProNet Comments at 2.

¹⁰AMTA Comments at 14.

operation which ultimately will be borne by the end users and decrease the competitiveness of 220 Band operators with other service alternatives.

Securicor understands that AMTA will be submitting with its Reply Comments a proposal for providing existing licensees protection from harmful interference based upon the licensees' 28 dbu service contours. Securicor concurs with and joins in the AMTA consensus proposal in this respect.¹¹

Securicor strongly opposes the suggestion of Metricom that the FCC should not require non-narrowband equipment entering the 220 Band through aggregated channels to meet a spectrum efficiency standard. As Securicor noted in its Comments, the very narrowband 5 kHz equipment being deployed today in the 220 Band, including Securicor's Linear Modulation equipment, represents the state-of-the-art in spectrally-efficient technologies, precisely as the FCC intended when it made the 220 Band allocation in 1991. In the event that the Commission elects to permit wideband systems in the 220 Band, it must not also take a step backwards by not requiring the deployment of spectrally-efficient technology. Instead, the FCC should continue to view the fundamental purpose of the 220 Band allocation as promoting the deployment of highly spectrally-efficient equipment, which may ultimately benefit operations in many other bands as well.

¹¹Securicor similarly concurs with ComTECH (Comments at 7) that the authorization of secondary systems for fixed use will not serve the public interest. These secondary authorizations will likely decrease the value of the Phase II licenses.

Accordingly, Securicor renews its suggestion that the FCC adopt spectrum efficiency standards that require that wideband systems entering the 220 Band provide one high-grade voice channel with performance equalling that of a toll quality telephone circuit and a data rate of 14.4 kb/s for every 5 kHz of spectrum aggregated.¹²

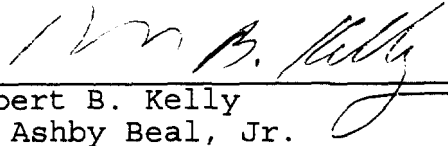
¹²Securicor wishes to correct for the record any misimpression arising from the letter appended to the Comments of SunCom Mobile & Data, Inc. ("SunCom"). SunCom, in particular, suggests that Securicor and E.F. Johnson "cooperate in manufacturing the same 'Linear Modulation' equipment." As documented in earlier filings, Securicor has licensed E.F. Johnson to develop Linear Modulation equipment independent from any LM equipment that may be developed by Securicor. The two companies are thus pursuing separate tracks and developing separate product lines (and each is making its own choices regarding trunking protocols and the like). In addition, Securicor wishes to confirm that it is manufacturing LM base stations and mobiles in volume, which may be purchased by any party subject to availability and Securicor's standard business terms.

For these reasons, Securicor respectfully urges the FCC to adopt a Report and Order in this Proceeding consistent with the modifications suggested herein and in Securicor's Comments.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, W. Ashby Beal, Jr., hereby certify that on this 12th day of October, 1995, a copy of the foregoing Reply Comments of Securicor Radiocom, Ltd. was served by hand or by U.S. first-class mail, postage prepaid, on the following:

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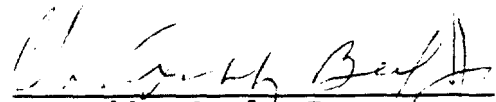
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